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VIA ELECTRONIC FILING

September 20, 2024

The Honorable Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: Request for extension of email production deadline
Tyler Erdman v. Adam Victor, et al., No. 20 Civ. 4162**

Dear Judge Gorenstein,

This letter is written to request an extension of the deadline of production of email accounts belonging to the defendant, as ordered during the conference with the court dated September 6, 2024, presently set for September 20, 2024.

Paragraph 1.E of the Court's Individual Rules and Practices states requests for extensions of deadlines must state (1) the date or dates sought to be extended, (2) the number of previous requests for extensions, (3) the reason for the extension, and (4) whether the adversary objects and, if so, the reasons given by the adversary for objecting.

This is the first request for an extension of the email production deadline. The extension is needed so the Defendant can complete the collection and production of emails from the accounts indicated at the conference with the court dated September 6, 2024. We logged on to Mr. Victor's email sites with the provided user names and passwords and the gross number of emails (a cursory review of which revealed numerous privileged items) were in excess of 1,000.


PLEASE RESPOND TO BROOKLYN OFFICE

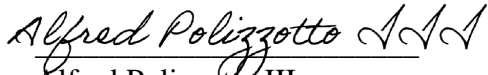
Plaintiff was consulted yesterday and today. He was asked numerous times if he consents to the extension and has refused to answer. Therefore, we decided to submit our request before more time had passed.

This letter proposes a change of the email production deadline from September 20, 2024, to October 20, 2024.

Yours faithfully

Polizzotto & Polizzotto, LLC


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